

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

PAIGE HOWLING WOLF

INDICTMENT

Case No. _____

Violation(s): 18 U.S.C. §§ 1112, 1153, and 13; and N.D.C.C. §§ 14-09-22, 14-09-22.1, 12.1-32-01, and 12.1-32-15

COUNT ONE

Involuntary Manslaughter in Indian Country

The Grand Jury Charges:

On or about June 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

PAIGE HOWLING WOLF,

an Indian, unlawfully killed a human being, K.H.W. (YOB 2019), an Indian, without malice, in the commission of a lawful act in an unlawful manner, and without due caution and circumspection, which might produce death. Such act was committed in a grossly negligent and reckless manner, with actual knowledge that her conduct was a threat to the lives of others or with actual knowledge that would reasonably enable her to foresee the peril to which her act might subject another, to wit: PAIGE HOWLING WOLF did unlawfully kill K.H.W. by failing to feed and care for him in a grossly negligent and reckless manner and did thereby commit the crime of involuntary manslaughter;

In violation of Title 18, United States Code, Sections 1112 and 1153.

COUNT TWO

Child Neglect in Indian Country

The Grand Jury Further Charges:

On or about June 24, 2020, in Indian country, and within the exclusive jurisdiction of the United States,

PAIGE HOWLING WOLF,

an Indian, was the parent, guardian, custodian, and adult family and household member of K.H.W (YOB 2019), an Indian child, and willfully failed to provide proper parental care and control as required by law, and other care or control necessary for K.H.W.'s physical, mental, and emotional health, or morals;

In violation of Title 18, United States Code, Sections 13 and 1153; and North Dakota Century Code, Sections 14-09-22.1, 12.1-32-01, and 12.1-32-15.

COUNT THREE

Child Abuse in Indian Country

The Grand Jury Further Charges:

On or about June 24, 2020, in Indian country, and within the exclusive jurisdiction of the United States,

PAIGE HOWLING WOLF,

an Indian, was the parent, guardian, custodian, and adult family and household member of K.K. (YOB 2016), an Indian child under the age of six, and willfully inflicted mental and bodily injury upon K.K. (YOB 2016);

In violation of Title 18, United States Code, Sections 13 and 1153; and North Dakota Century Code, Sections 14-09-22, 12.1-32-01, and 12.1-32-15.

COUNT FOUR

Child Abuse in Indian Country

The Grand Jury Further Charges:

On or about June 24, 2020, in Indian country, and within the exclusive jurisdiction of the United States,

PAIGE HOWLING WOLF,

an Indian, was the parent, guardian, custodian, and adult family and household member of A.K. (YOB 2014), an Indian child under the age of six, and willfully inflicted mental and bodily injury upon A.K. (YOB 2014);

In violation of Title 18, United States Code, Sections 13 and 1153; and North Dakota Century Code, Sections 14-09-22, 12.1-32-01, and 12.1-32-15.

COUNT FIVE

Child Abuse in Indian Country

The Grand Jury Further Charges:

On or about June 24, 2020, in Indian country, and within the exclusive jurisdiction of the United States,

PAIGE HOWLING WOLF,

an Indian, was the parent, guardian, custodian, and adult family and household member of N.K. (YOB 2013), an Indian child, and willfully inflicted mental and bodily injury upon N.K. (YOB 2013);

In violation of Title 18, United States Code, Sections 13 and 1153; and North Dakota Century Code, Sections 14-09-22, 12.1-32-01, and 12.1-32-15.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

EBL/tmg